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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C.

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JUL 27 1993

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of

1993 Annual Access  
Tariff Filings

National Exchange Carrier  
Association Universal Service  
Fund and Lifeline Assistance  
Rates

GSF Order Compliance Filings

Bell Operating Companies'  
Tariff for the 800 Service  
Management System and 800  
Data Base Access Tariffs

CC Docket No. 93-193

UNITED TELEPHONE AND CENTRAL TELEPHONE COMPANIES DIRECT CASE

- 2) reallocation of GSF costs; and
- 3) assignment of LIDB per query charges to price cap categories.<sup>2</sup>

To avoid burdening the record, United and Central incorporate by reference into this direct case the following material:

1. United Telephone Companies Transmittal No. 325, 1993  
Annual Access Tariff Errata Filing, June 10, 1993,  
Consolidated Description and Justification.
2. United Telephone Companies Transmittal No. 327, GSF

and proposed access rates reflected the sharing obligation for 1992.<sup>4</sup> United did not "add back" the effect of 1991 sharing accomplished through 1992 rates to the 1992 results. Thus, the 1992 sharing accomplished through 1993 rates does not reflect "add back" of the sharing effect on a traditional rate of return basis.

## II. GSF COST ALLOCATIONS

The Commission ordered changes to its rules to reflect modifications to the former GSF allocations, and implementation of new GSF allocations in its GSF Allocation Order.<sup>5</sup> The Commission directed LECs to reflect the GSF allocation changes contained in Commission Rules Part 69 in the Annual Access Charge Filing to be effective July 1, 1993.<sup>6</sup> United complied with this requirement in its Transmittal No. 327 and Central in its Transmittal No. 228.

United and Central assert that they complied with the terms of the GSF Allocation Order and respectfully refer the Commission to their transmittals.

## III. LIDB PER QUERY CATEGORY ASSIGNMENT

The Commission has asked a question concerning to what category or categories the LIDB per query charge should be assigned.

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4. See United Transmittal 325 at 8-9.

5. Amendment of the Part 69 Allocation of General Support Facility Costs ("GSF Allocation Order"), CC Docket No. 92-222, released May 19, 1993.

6. Id. at para. 16.

United and Central assigned the LIDB elements to the traffic sensitive basket. Once assigned to the traffic sensitive basket, a determination needed to be made concerning whether to assign elements to transport or switching.

In United and Central's view, moving a LIDB query from the carrier to the LEC STP involves transport, while moving the query within the LEC and determining how and where to move the underlying call involves switching. Using these basic assumptions, United constructed its LIDB tariffs.

The Commission established the basic framework for LIDB tariffing through a series of LIDB related orders. In the Southwestern Bell Waiver the Commission established "a new, flat-rated subelement in the Transport element for STP port termination."<sup>7</sup> Further, the Commission found that "the costs of STP Access Mileage are properly recovered as a new dedicated transport subelement in the transport element."<sup>8</sup> United followed this direction and requested a similar waiver which was granted by the Commission.<sup>9</sup> In the Southwestern Bell Waiver, the

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7. Southwestern Bell Telephone Company Petitions for Waiver of Part 69 of the Commission's Rules. ("Southwestern Bell Waiver"), Memorandum Opinion and Order, DA 91-1258, released October 4, 1991, at para. 29.

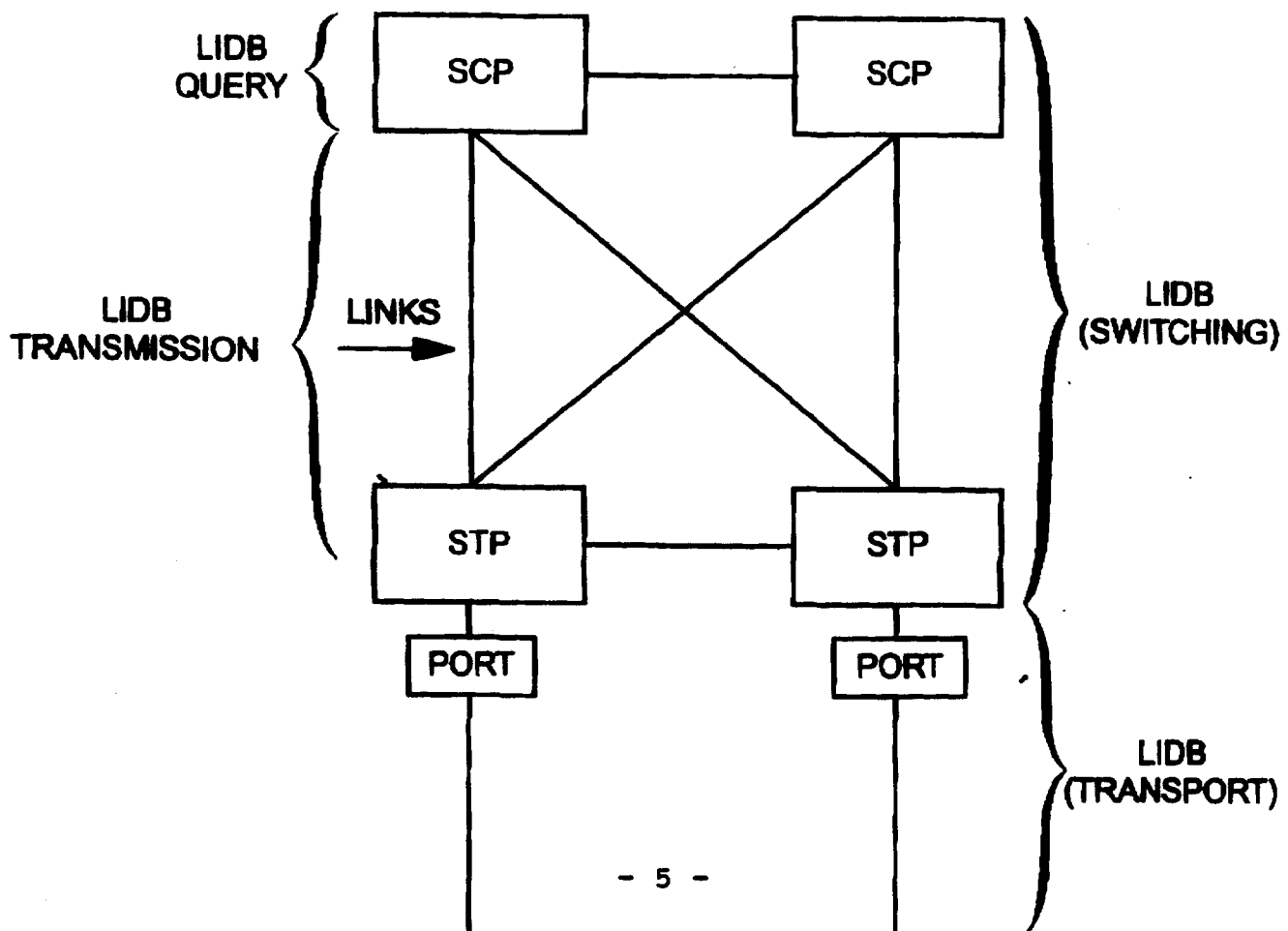
8. Id. at para. 30.

9. See Local Exchange Carrier Line Information Database, Order, DA 91-1637, released December 30, 1991 at paragraphs 1 and 54.

Commission did not provide guidance concerning which access element or price cap category should receive the assignment of the LIDB query charge.

United and Central assert that the LIDB query itself is properly assigned to the switching element rather than the transport element. Switching involves information necessary to route calls to their destination or to refuse completion of the calls as appropriate. The LIDB makes logical decisions concerning call routing and provides information necessary in call delivery -- whether the call should be completed or not. Thus, LIDB is primarily a switching function, not a transport function.

The LIDB network is logically configured as shown below:



Both the LIDB Query and LIDB Transmission subelements are assigned to the switching category by United. In terms of cost, the transmission element consists of link cost and STP cost. The link accounts for \$.0004 and the STP \$.0012 of the \$.0016 total transmission element cost. Thus, the STP, or Signaling Transfer Point, is 75% of the total cost. Because the predominant cost characteristic of the LIDB Transmission element is switching related, it is appropriate to assign this element to the switching category.

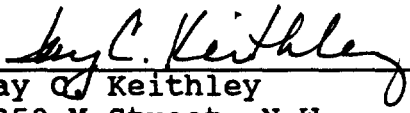
Both LIDB Queries and LIDB Transmission are switching related. The STP balances the load on the LIDB by switching to

#### IV. CONCLUSION

United and Central assert that they have complied with the appropriate Commission rules and orders in their implementation of price caps sharing, GSF reallocation, and LIDB Query and Transmission category assignment.

Respectfully submitted,

UNITED TELEPHONE COMPANIES  
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July 27, 1993



## **CERTIFICATE OF SERVICE**

I, Melinda L. Mills, hereby certify that I have on this 27th day of July, 1993, sent via U.S. First Class Mail, postage prepaid, or Hand Delivery, a copy of the foregoing "United Telephone and Central Telephone Companies Direct Case," in the Matter of 1993 Annual Access Tariff Filings; National Exchange Carrier Association Universal Service Fund and Lifeline Assistance Rates; GSF Order Compliance Filings; Bell Operating Companies' Tariff for the 800 Service Management System and 800 Data Base Access Tariffs, CC Docket No. 93-193, filed this date with the Acting Secretary, Federal Communications Commission, to the persons listed on the attached service list.

  
Melinda L. Mills

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